

ROCK N' J PROPERTIES LLC
43977 Joseph Creek Rd.
Asotin Wa. 99402

Kris Stein, District Ranger
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Re: Comment on the Cold Elk Rangeland Analysis

Rock n' J Properties appreciate this opportunity to comment on the Cold Elk Draft Environmental Assessment and we have a number of concerns. Our number one concern would be the requirement of riparian fencing along Peavine Creek which has no history of Steelhead spawning, no history of streambank deterioration and no documentation of riparian overgrazing. In addition it has no water present for 75% of the year. It is an intermittent stream at best, is dry July 1st. and what little pooling is present is frozen solid from Nov. 1st until spring thaw.

Another area of concern which effects the allotment significantly is the non-management of the timber resource which has led to encroachment, diseased and dying trees, deadfall on fencing, decreased infiltration into the soil surface because of canopy overload and an increasing risk of fire. All of these factors create problems for livestock use and indeed put our capital at risk as we enter an era of catastrophic fire damage.

In addition roads are being decommissioned in many areas, and over regulated in others. There is a total lack of infrastructure repair and maintenance on the Forest road system which leads to not only hazardous driving conditions but tremendous vehicle expense as we attempt to appropriately manage our allotment.

I realize that some of these comments are out of the scope of this analysis but they relate significantly to it. They all influence the health of our livestock herd, the manner in which we can proactively work on the ground to minimize resource problems, and the well being of our valuable labor pool.

Thank you for the opportunity to establish standing in this process and we look forward to working collaboratively through it.

Chris Cunningham
Rock n' J Ranch Manager